

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

OCIE TODD, ET AL.

V.

**AMERIQUEST MORTGAGE
COMPANY, ET AL.**

CIVIL ACTION NO.:
3:07 CV 01188(AWT)

OCTOBER 12, 2007

DEFENDANTS' MOTION, ON CONSENT, FOR EXTENSION OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), and District of Connecticut Local Rule of Civil Procedure 7(b), the Defendants, Ameriquest Mortgage Company ("Ameriquest") and Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates Series 2004-R1 Under the Pooling & Servicing Agreement Dated as of February 1, 2004, Without Recourse ("Deutsche Bank") respectfully move, with the consent of the Plaintiff, for a thirty-day extension of time to file an Answer or Motion in Response to the Plaintiffs' Complaint.

This is the Defendants' first motion seeking an extension of time. Good cause exists for granting the motion, because a Conditional Transfer Order has been entered by the Judicial Panel on Multidistrict Litigation (the "Panel" or "JPMDL"), designating this case as a "tag-along action" to MDL 1715 – *In Re Ameriquest Mortgage Company Mortgage Lending Practices Litigation* (the "Ameriquest MDL"), pending in the United States District Court for the Northern District of Illinois. If the case is transferred, the timing of the parties' motions, answers and other pretrial proceedings will be governed by the Orders of the MDL Court. Accordingly, in the interest of judicial economy, and to

avoid unnecessary fees and expenses for the parties, a thirty-day extension of time pending a final determination of the status of this matter as a tag-along action is warranted.

In further support of their motion the Defendants state that their counsel has conferred with Plaintiff's counsel regarding this motion, and the Plaintiff consents to the requested extension of time.

WHEREFORE, for all of the foregoing reasons, the Defendants respectfully request that their Motion, on Consent, for Extension of Time be granted.

THE DEFENDANTS,
AMERIQUEST MORTGAGE COMPANY and
DEUTSCHE BANK

/s/

Elizabeth M. Smith (ct 19808)
esmith@thelen.com
THELEN REID BROWN RAYSMAN
& STEINER, LLP
185 Asylum St.
CityPlace II/10th Floor
Hartford, CT 06103
Telephone: (860) 275-6400
Facsimile: (860) 275-6410

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. Rule 5(b), I hereby certify that a copy of the foregoing Motion for Extension of Time was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing this 12th day of October, 2007.

Daniel S. Blinn (ct02188)
dblinn@consumerlawgroup.com
Andrew G. Pizer (ct27015)
apizer@consumerlawgroup.com
CONSUMER LAW GROUP, LLC
35 Cold Spring Road, Ste. 512
Rocky Hill, CT 06067
Telephone: (860) 571-0408
Facsimile: (860) 571-7475

/s/
Elizabeth M. Smith

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